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October 22, 2013

Via ECFS

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte* Filing by the American Cable Association (ACA) on Rural Call Completion; WC Docket No. 13-39

Dear Ms. Dortch:

On October 21, 2013, Ross Lieberman (ACA) and the undersigned, Thomas Cohen (Kelley Drye & Warren LLP, Counsel to ACA), met separately with Rebekah Goodheart, Legal Advisor, Wireline, to Interim Chairwoman Clyburn, and Travis Litman, Wireline Competition Bureau, Nicholas Degani, Legal Advisor, Wireline, to Commissioner Pai, and Priscilla Delgado Argeris, Legal Advisor to Commissioner Rosenworcel. The purpose of the meetings was to discuss the views of ACA in response to the Commission's Notice of Proposed Rulemaking on Rural Call Completion. At each meeting, Mr. Lieberman made the following points:

1. Rural call completion issues are a serious and continuing problem that the Commission should address with effective solutions.
2. The Commission can best fix the problem by holding responsible and applying regulations to the initial facilities-based long distance provider,¹ who is the primary economic beneficiary of the service, controls long-distance routing, and has direct access to data on call completion. The Commission should not to apply new regulations to local service providers, which on one

¹ For purposes of this proceeding, ACA defines a facilities-based long distance provider (which includes an interexchange carrier) as the provider that transports (or for an intermediate provider, participates in transporting) a long-distance call from the calling party's local service provider's service area to the called party's local service provider's service area. The local service provider's network would include its end office and/or tandem switching.

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end provide a connection for the facilities-based long distance provider to reach its customer and, on the terminating end, for a facilities-based long distance provider to reach the called parties.

3. If the Commission decides to impose requirements on local service providers, it should exempt providers with 100,000 or fewer retail long-distance subscribers because they transmit a small percentage of long-distance calls and the proposed recordkeeping, reporting, and audit requirements would impose an substantial burden on them.

This letter is being filed electronically pursuant to section 1.1206 of the Commission's rules.

Sincerely,



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cc: Rebekah Goodheart
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